

JUL 08 2003

Mr. Aaron W. Miller  
The Doe Run Company  
881 Main Street  
Herculaneum, Missouri 63048



Dear Mr. Miller

Re: Approval with Modifications for the June 2003 Materials Transportation  
and Handling Plan for the Herculaneum Lead Smelter

The United States Environmental Protection Agency (EPA) is approving of the subject document with conditions. The conditions provided in this letter shall be incorporated into the Plan and take precedent over procedures identified in the June 2003 version of the Plan. I have also enclosed a copy of the EPA's comments on the May revision of the Plan that I had previously provided you in draft form.

**Conditions:**

1. All vehicles exiting the Red Zone will be washed in the enclosed truck wash with the exception of oversized vehicles that can not fit in the enclosed vehicle wash.
2. The east road comparison sampling protocol will be implemented by October 1, 2003. You should coordinate the cleaning and sampling of a non-haul route road in Herculaneum this July with Jim Silver. The EPA will randomly select times when verification sampling of the east road will be performed. The EPA will randomly select different sample locations anywhere along the east road from the product dock to the enclosed truck wash. If required, Doe Run will provide an escort for verification sampling within one hour of notification of sampling by an EPA representative. Doe Run will not clean or sweep the east road between the time of sample collection notification and sample collection of the east road.
3. The street sampling protocol provided in Appendix E is not required for this revision of the Materials Transportation and Handling Plan. The EPA will be collecting street verification and monitoring samples in accordance with the EPA Quality Assurance Project Plan. Only the EPA collected sample data will be evaluated for determining compliance with the east road/green zone criteria.

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4. Doe Run should provide the EPA with design details for the concentrate unloading station, truck tailgate modifications, and the automated vehicle wash as they become available.

**Previous comments:**

1. The final version of the revised plan should contain the figures and Appendices identified in the Table of Contents.

2. The seventh sentence of Section 3.1.2.1 should be deleted. It is speculative and not necessary.

3. The third sentence of Section 3.1.2.3 should be deleted. It is speculative and not necessary.

4. The fourth sentence of Section 3.1.3 should be rewritten to read “All roads within the green zone are external to the lead-bearing materials handling areas and are considered relatively clean when compared to red zone roads.”

5. The first sentence of Section 3.1.3.4 should be rewritten to read, “The concentrate truck unloading facility was designed to reduce potential tracking issues associated with concentrate trucks entering the red zone to unload (see Figure 1).”

6. Section 3.1.3.4: This Section should describe the existing structural controls currently being implemented at the concentrate truck unloading station without the use of italicized sentences, historical perspectives on procedural changes, speculation on future operations, and rationale for the procedures.

7. Section 3.1.3.4: Item Number 7 of this Section should be edited to include only the first sentence of this item.

8. Section 3.1.3.6: The third sentence of this section should be edited to read, “All vehicles that enter the red zone .....”. The last two paragraphs of this section should be deleted/moved to Section 3.1.3.6 because they pertain to new proposals for best management practices.

9. Section 3.1.6.1: The following sentence should be added after the first sentence of this Section, “All lead concentrate and vehicles exiting the red zone will be washed at the all-weather vehicle wash facility with the exception of oversized vehicles.”

10. Section 3.3.1.1: This Section should be rewritten to only describe the best management practices being used and proposed to prevent the leakage of concentrate from the trucks. Sentences 5 through 9, and 12 through 14 of this Section should be deleted. This Section should indicate a stronger commitment from Doe Run that steps will be taken to ensure that lead concentrate leakage from trucks is prevented. You have indicated that the spray foam insulation is effective at preventing the leakage of fertilizer from tailgates. Based on that performance, Doe Run should implement the spray foam insulation procedure as soon as possible. The evaluation

of soft rubber gaskets on tailgates should also be performed immediately. Our oversight continues to document the release of lead concentrate at the official certification sampling area at the intersection of Station and Main Street. The EPA recommends Doe Run quickly implement measures to reduce the potential for concentrate releases from the trucks.

11. Section 3.3.2 is inconsistent with the plan's format and should be rewritten to describe "existing best management practices" and "proposed best management practices".

12. Section 3.3.2.1: The first sentence of this section should be rewritten to read, "All of the designated green zone and the full length of the designated routes from Hwy 61/67 to the plant through Herculaneum are and will continue to be mechanically..."

13. Section 3.3.2.3: This Section should be rewritten to read, "The Doe Run Company crews will inspect the designated haul roads up to Highway 61/67 on a daily basis. Spills will be cleaned up promptly in accordance with the appropriate spill response procedures provided in Appendix B.

14. A schedule page should be inserted at the end of Section 3 that lists the structural controls/best management practices and their corresponding implementation date/time. The schedule list should include but not be limited to gate construction completion, road construction completion and utilization, automated truck wash completion and full utilization for concentrate trucks, concentrate unloading station completion and utilization, east road comparison sampling protocol implementation, unloader station doors construction completion, ultra vac utilization, lime scaling of stockpiles implementation, and concentrate truck tailgate seals/spray foam insulation evaluation/implementation.

15. Section 6.1.2: The first sentence should provide the date the doors at the railcar unloader structure are required to be in place and not refer the reader to the SIP.

In conclusion, the Doe Run Company needs to implement this plan and any additional controls that will prevent leakage from concentrate trucks and the tracking of lead bearing materials out of the smelter facility. I can be reached at 913-551-7755 if you have questions concerning these conditions and comments.

Sincerely,

Bruce A. Morrison  
Project Manager  
Superfund Division

cc: Bob Hinkson, MDNR  
Dave Mosby, MDNR  
Leslie Warden, CAG

bcc: Jim Silver, OSC